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Attorneys for Defendant BLACKBERRY  
CORPORATION

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10 **UNITED STATES DISTRICT COURT**  
11 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

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13 Neelam Sandhu, an individual,

14 Plaintiff,

15 vs.

16 BLACKBERRY CORPORATION; a  
Delaware Corporation,

17 Defendant.  
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**Case No.: 3:24-cv-02002-SK**

**JOINT STIPULATION AND [PROPOSED]  
ORDER REGARDING SCHEDULE FOR  
DEFENDANT'S MOTION FOR SUMMARY  
JUDGMENT**

Judge: Hon. Sallie Kim

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20 Pursuant to Civil Local Rules 7-11 and 7-12, Plaintiff Neelam Sandhu and Defendant  
21 BlackBerry Corporation, by and through their respective counsel, hereby agree as follows:

22 WHEREAS, on October 27, 2025, the Court issued an Amended Case Management and  
23 Pretrial Order setting the "last day for hearing on dispositive motions" for March 9, 2025. *See*  
24 Dkt. No. 95 at 2.

25 WHEREAS, the Court's Order set specific briefing deadlines for cross-motions for  
26 summary judgment and provided only that, "[i]f only one side intends to file a motion for  
27 summary judgment, the briefing schedule set forth in the Northern District Local Civil Rules  
28 applies," *id.* at 2.

Case No. 3:24-cv-02002-SK

1 WHEREAS, Defendant intends to file a motion for summary judgment;  
2 WHEREAS, Plaintiff does not intend to file a motion for summary judgment;  
3 WHEREAS, due to unavailability of the Court and counsel in February 2026, Defendant  
4 wishes the motion to be heard on January 26, 2026;

5 WHEREAS, the parties have met and conferred and reached agreement on a schedule for  
6 Defendant's motion for summary judgment and associated briefing that accommodates the  
7 availability of Plaintiff's counsel and their staff over the holidays;

8 WHEREAS, the Parties submit that the proposed schedule does not affect any other Court-  
9 ordered deadline, and should not result in prejudice to any of the parties;

10 THEREFORE, IT IS STIPULATED AND AGREED, subject to the Court's approval, that  
11 the schedule for Defendant's Motion for Summary Judgment and any associated briefing on shall  
12 be as follows:

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Event	Date
Defendant's Motion for Summary Judgment	December 10, 2025
Plaintiff's Opposition	January 5, 2026
Defendant's Reply	January 12, 2026
Hearing on Motion for Summary Judgment	January 26, 2026

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20 Dated: December 4, 2025

MUNGER, TOLLES & OLSON LLP

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23 By: /s/ Katherine M. Forster  
24 KATHERINE M. FORSTER

25 Attorneys for Defendant  
26 BLACKBERRY CORPORATION  
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Dated: December 4, 2025

GOMERMAN | BOURN & ASSOCIATES

By:           /s/ Anthony Tartaglio            
          ANTHONY TARTAGLIO

Attorneys for Plaintiff  
NEELAM SANDHU

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[PROPOSED] ORDER

Given the upcoming winter holidays, the parties have asked for the following briefing and hearing schedule:

Event	Date
Defendant’s Motion for Summary Judgment	December 10, 2025
Plaintiff’s Opposition	January 5, 2026
Defendant’s Reply	January 12, 2026
Hearing on Motion for Summary Judgment	January 26, 2026

The Court orders the parties to comply with this briefing and hearing schedule, should Defendant file its motion on or before December 10, 2025.

**PURSUANT TO STIPULATION AND GOOD CAUSE APPEARING, IT IS SO ORDERED.**

Dated: \_\_\_\_\_ By: \_\_\_\_\_  
SALLIE KIM  
UNITED STATES MAGISTRATE JUDGE

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/s/ Katherine M. Forster

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